

EPA Jacket
83100-56
Vol. 1

PROCESSING REQUEST

Reg # 83100-~~A~~⁵⁶ Decision # 527179

Description: New Product

Electronic Label & Letter
(see PPLS):

OR

Non Electronic
Label & Letter
(Scanning required):

☒ Dated: 11-3-17

☐ Dated:

Only one label type should be selected

Other Materials Sent (see jacket):

☒ New CSF(s) Dated: Basic + Alt 1-2 - 3-13-17

☐ Other:

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: Grant Rowland

Division: OPP/RD/HB

Phone: 703-347-0254

Date:



U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs
Registration Division (7505P)
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460

EPA Reg. Number:

83100-56

Date of Issuance:

11/3/17

NOTICE OF PESTICIDE:

☒ Registration
☐ Reregistration
(under FIFRA, as amended)

Term of Issuance:

Conditional

Name of Pesticide Product:

DICAMBA 52.94% +
RIMSULFURON 6.25% WDG

Name and Address of Registrant (include ZIP Code):

Rotam Agrochemical Company Ltd
c/o Wagner Regulatory Associates, Inc
P.O. Box 640
7217 Lancaster Pike, Suite A
Hockessin, DE 19707

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA section 3(c)(7)(A). You must comply with the following conditions:

1. Submit and/or cite all data required for registration/reregistration/registration review of your product under FIFRA when the Agency requires all registrants of similar products to submit such data.

Signature of Approving Official:

Kathryn Montague, Product Manager 23
Herbicide Branch Registration Division (7505P)

Date:

11/3/17

2. You are required to comply with the data requirements described in the DCI identified below:

a. Dicamba GDCI-029801-1659

You must comply with all of the data requirements within the established deadlines. If you have questions about the Generic DCI listed above, you may contact the Chemical Review Manager in the Pesticide Reevaluation Division: <http://iaspub.epa.gov/apex/pesticides/f?p=chemicalsearch:1>

3. Make the following label changes before you release the product for shipment:

- Revise the EPA Registration Number to read, "EPA Reg. No. 83100-56."

4. Submit one copy of the final printed label for the record before you release the product for shipment.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

If you fail to satisfy these data requirements, EPA will consider appropriate regulatory action including, among other things, cancellation under FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records. Please also note that the record for this product currently contains the following CSFs:

- Basic CSF dated 03/13/2017
- Alternate CSF 1 dated 03/13/2017
- Alternate CSF 2 dated 03/13/2017

If you have any questions, please contact Grant Rowland by phone at 703-347-0254, or via email at rowland.grant@epa.gov.

Enclosure

GROUP

HERBICIDES

Dicamba 52.94% + Rimsulfuron 6.25% WDG

A Product for Post-Emergence Use in Field Corn**ACTIVE INGREDIENTS:****BY WT.**

Sodium salt of dicamba

(3,6-dichloro-2-methoxybenzoic acid)..... 52.94%

Rimsulfuron

N-((4,6-dimethoxypyrimidin-2-yl)aminocarbonyl)-3-(ethylsulfonyl)-2-pyridinesulfonamide..... 6.25%

OTHER INGREDIENTS:..... 40.81%**TOTAL:**..... 100.00%

This product contains 48.12% 3,6-dichloro-2-methoxybenzoic acid (dicamba).

This product contains 0.004 lb. rimsulfuron per ounce and 0.03 lb. dicamba (salt) per ounce.

ACCEPTED

11/03/2017

Under the Federal Insecticide, Fungicide
and Rodenticide Act as amended, for the
pesticide registered under
EPA Reg. No. 83100-56**KEEP OUT OF REACH OF CHILDREN
CAUTION**

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.

(If you do not understand the label, find someone to explain it to you in detail.)

FIRST AID

IF IN EYES:	<ul style="list-style-type: none"> Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
IF SWALLOWED:	<ul style="list-style-type: none"> Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything to an unconscious person.
IF ON SKIN OR CLOTHING:	<ul style="list-style-type: none"> Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

HOTLINE NUMBERS

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.
For 24-Hour Medical Emergency Assistance (Human or Animal), call: **1-800-222-1222**. For Chemical Emergency Assistance (Spill, Leak, Fire, or Accident), call **CHEMTREC: 1-800-424-9300**.

[Optional referral statements when booklets and container labels are used:

See Panel for First Aid Instructions and booklet for complete Precautionary Statements and Directions For Use.

See label booklet for complete Precautionary Statements, Directions For Use, and Storage and Disposal.

See label booklet for additional Precautionary Statements, Directions For Use, and Storage and Disposal.

See label booklet for complete Directions For Use.]

Manufactured For:

Rotam Agrochemical Co. Ltd.

26/F, E-Trade Plaza

24 Lee Chung Street

Chai Wan, Hong Kong

EPA Reg. No.: 83100-XX**EPA Est. No.:****Net Contents:**

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS & DOMESTIC ANIMALS****CAUTION**

Causes moderate eye irritation. Harmful if swallowed. Harmful if absorbed through skin. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse. Wear protective eyewear and clothing.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Chemical-resistant gloves made of barrier laminate, butyl rubber ≥ 14 mils, nitrile rubber ≥ 14 mils, neoprene ≥ 14 mils, polyvinyl chloride ≥ 14 mils, or Viton ≥ 14 mils
- Shoes plus socks
- Protective eyewear

See **ENGINEERING CONTROLS STATEMENTS** for additional requirements and exceptions.

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

ENGINEERING CONTROL STATEMENTS

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR Part 170.240 (d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS. Pilots must use cockpits in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR Part 170.240 (d)(4-6)].

USER SAFETY RECOMMENDATIONS

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

Do not apply directly to water, or to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water by cleaning of equipment or disposal of equipment washwaters or rinsate. Keep out of lakes, streams, or ponds. Apply this product only as directed on the label.

Dicamba is known to leach through soil into ground water under certain conditions as a result of agricultural use. Use of this product in areas where soils are permeable, particularly where the water table is shallow, may result in ground water contamination. DO NOT discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollution Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. DO NOT discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

Ground and Surface Water Protection

Point source contamination: To prevent point source contamination, do not mix, load this pesticide product within 50 feet of wells (including abandoned wells and drainage wells), sink holes, perennial or intermittent streams and rivers, and natural or impounded lakes and reservoirs. Do not apply pesticide product within 50 feet of wells. This setback does not apply to properly capped or plugged abandoned wells and does not apply to impervious pad or properly diked mixing/loading areas as described below. Mixing, loading, rinsing, or washing operations performed within 50 feet of a well are allowed only when conducted on an impervious pad constructed to withstand the weight of the heaviest load that may be on or move across the pad. The pad must be self-contained to prevent surface water flow over or from the pad. The pad capacity must be maintained at 110% that of the largest pesticide container or application equipment used on the pad and have sufficient capacity to contain all product spills, equipment or container leaks, equipment wash waters, and rainwater that may fall on the pad. The containment capacity does not apply to vehicles delivering pesticide shipments to the mixing/loading site.

Surface Water Advisory

This product may impact surface water quality due to runoff of rain water. This is especially true for poorly draining soils and soils with shallow ground water. This product is classified as having high potential for reaching surface water via runoff for months or more after application. A level, well-maintained vegetative buffer strip between areas to which this product is applied and surface water features such as ponds, streams, and springs will reduce the potential loading of rimsulfuron

from runoff water and sediment. Runoff of this product will be greatly reduced by avoiding applications when rainfall or irrigation is expected to occur within 48 hours.

States may have in effect additional requirements regarding wellhead setbacks and operational containment. Care must be taken when using this product to prevent: a) back siphoning into wells, b) spills or c) improper disposal of excess pesticide, spray mixtures or rinsates. Check valves or antisiphoning devices must be used on all mixing equipment.

Movement by surface runoff or through soil: Do not apply under conditions which favor runoff. Do not apply to impervious substrates such as paved or highly compacted surfaces in areas with high potential for ground water contamination. Ground water contamination may occur in areas where soils are permeable or coarse and ground water is near the surface. Do not apply to soils classified as sand with less than 3% organic matter and where ground water depth is shallow. To minimize the possibility of ground water contamination, carefully follow application rate recommendations as affected by soil type in the general information section of this label.

Movement by water erosion of treated soil: Do not apply or incorporate this product through any type of irrigation equipment nor by flood or furrow irrigation. Ensure treated areas have received at least one-half inch rainfall (or irrigation) before using tailwater for subsequent irrigation of other fields.

Endangered Species Concerns

The use of any pesticide in a manner that may kill or otherwise harm an endangered species or adversely modify their habitat is a violation of Federal Law.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 24 hours.

Exception: If the product is soil injected or soil incorporated, the Worker Protection Standard, under certain circumstances, allows workers to enter the treated areas if there will be no contact with anything that has been treated.

The following PPE is required for early entry into treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water:

- Coveralls worn over short-sleeve shirt and short pants
- Chemical-resistant footwear plus socks
- Chemical-resistant gloves made of barrier laminate, butyl rubber ≥ 14 mils, nitrile rubber ≥ 14 mils, neoprene ≥ 14 mils, polyvinyl chloride ≥ 14 mils, or Viton ≥ 14 mils
- Chemical-resistant headgear for overhead exposure
- Protective eyewear

Notify workers of the application by warning them orally and by posting warning signs at entrances to treated areas.

PRODUCT INFORMATION

Use Dicamba 52.94% + Rimsulfuron 6.25% WDG in accordance with instructions on this label. Rotam Agrochemical Co. Ltd. will not be responsible for losses or damage resulting from use of this product in any manner not specified by Rotam Agrochemical Co. Ltd.

Use Dicamba 52.94% + Rimsulfuron 6.25% WDG at the rate of 4 ounces per acre for burndown and residual control of certain annual grass and broadleaf weeds when applied pre-emergence and post-emergence. One 80 bottle will treat 20 acres at the 4 ounce per acre application rate.

Dicamba 52.94% + Rimsulfuron 6.25% WDG can be applied to "Roundup Ready" corn in tank mix combinations with glyphosate herbicides such as "Roundup Original", "Roundup Weathermax", or similar products to add residual control for later emerging weeds. Residual weed control is dependent on rainfall or sprinkler irrigation for herbicide activation.

Consult with your seed supplier before applying **Dicamba 52.94% + Rimsulfuron 6.25% WDG** to any corn types where specific seed company publications indicate "Warning", "Crop Response Warning", or "Sensitive" notations for the use of some ALS herbicides. Sulfonylurea herbicides such as **Dicamba 52.94% + Rimsulfuron 6.25% WDG** must be used with caution on these hybrids. Injury arising from the use of **Dicamba 52.94% + Rimsulfuron 6.25% WDG** on the above types of hybrids is the responsibility of the user. **Dicamba 52.94% + Rimsulfuron 6.25% WDG** can be applied to many field corn hybrid with a relative maturity (RM) of 77 days or more.

Use Restrictions

- Do not apply more than a total of 8 oz. **Dicamba 52.94% + Rimsulfuron 6.25% WDG** (or 0.5 oz. active ingredient rimsulfuron) during the crop year.
- Do not apply more than 4 oz. of **Dicamba 52.94% + Rimsulfuron 6.25% WDG** per acre per application.
- Do not apply to field corn grown for seed, to popcorn or to sweet corn.
- Do not make fallow applications to coarse-textured soils (sand, loamy sand, or sandy loam) with less than 3% organic matter.
- Do not apply pre-emergence to coarse-textured soils (sand, loamy sand, or sandy loam) with less than 1% organic matter.
- Do not apply by air in the State of New York.
- Do not apply this product through any type of irrigation-system.
- Do not treat irrigation ditches or water used for crop irrigation or domestic uses.
- Do not treat areas where either possible downward movement into the soil, or surface washing, may cause contact of **Dicamba 52.94% + Rimsulfuron 6.25% WDG** with the roots of desirable plants such as trees and shrubs.
- Do not apply to crops under stress due to lack of moisture, hail damage, flooding, herbicide injury, mechanical injury, insects, or widely fluctuating temperatures as injury may result.
- Do not apply **Dicamba 52.94% + Rimsulfuron 6.25% WDG** when soybeans are growing nearby if any of these conditions exist:
 - corn is more than 20" tall
 - soybeans are more than 10" tall
 - soybeans have begun to bloom

Use Precautions

- Ground or aerial application equipment which will give good spray coverage of weed foliage should be used.
- The applicator must follow the most restrictive use cautions to avoid drift hazards, including those found in this labeling, as well as State and local regulations and ordinances.
- Select nozzles designed to produce minimal amounts of fine spray particles. Spray with nozzles as close to the weeds as is practical for good weed coverage.
- Avoid disturbing (e.g., cultivating or mowing) for at least 7 days following application.
- Application(s) of **Dicamba 52.94% + Rimsulfuron 6.25% WDG** to corn during periods of rapid growth may result in temporary leaning. Corn will usually become erect within 3 – 7 days. Cultivation should be delayed until after corn is growing normally to avoid breakage.

Resistance Management

Dicamba 52.94% + Rimsulfuron 6.25% WDG contains both a Group 4/dicamba and a Group 2/rimsulfuron herbicide. Any weed population may contain plants naturally resistant to Group 4 and/or Group 2 herbicides. The resistant individuals may dominate the weed population if these herbicides are used repeatedly in the same fields. Appropriate resistance-management strategies should be followed.

To delay herbicide resistance take one or more of the following steps:

- Rotate the use of **Dicamba 52.94% + Rimsulfuron 6.25% WDG** or other Group 4 and 2 herbicides within a growing season sequence or among growing seasons with different herbicide groups that control the same weeds in a field.
- Use tank mixtures with herbicides from a different group if such use is permitted; where information on resistance in target weed species is available, use the less resistance-prone partner at a rate that will control the target weed(s) equally as well as the more resistance-prone partner. Consult your local extension service or certified crop advisor if you are unsure as to which active ingredient is currently less prone to resistance.
- Adopt an integrated weed-management program for herbicide use that includes scouting and uses historical information related to herbicide use and crop rotation, and that considers tillage (or other mechanical control methods), cultural (e.g., higher crop seeding rates; precision fertilizer application method and timing to favor the crop and not the weeds), biological (weed-competitive crops or varieties) and other management practices.
- Scout after herbicide application to monitor weed populations for early signs of resistance development. Indicators of possible herbicide resistance include: (1) failure to control a weed species normally controlled by the herbicide at the dose

Integrated Pest Management

Integrate **Dicamba 52.94% + Rimsulfuron 6.25% WDG** into an overall weed pest management strategy whenever the use of an herbicide is required. Practices known to reduce weed development (tillage, crop competition) and herbicide

use (weed scouting, proper application timing, banding) should be followed wherever possible. Consult local agricultural and weed authorities for additional IPM strategies established for your area.

Environmental Conditions And Biological Activity

Dicamba 52.94% + Rimsulfuron 6.25% WDG rapidly inhibits the growth of susceptible weeds through absorption via the shoots and roots of plants. Rainfall or sprinkler irrigation is required to move **Dicamba 52.94% + Rimsulfuron 6.25% WDG** into the soil. Susceptible weeds will typically not emerge from pre-emergence application. Occasionally, susceptible weeds may germinate and emerge a few days after application, but growth ceases and leaves become chlorotic three to five days after emergence. Death of leaf tissue and growing point will follow in some species, while others will remain green but stunted and noncompetitive. Weeds stressed from adverse environmental conditions (such as extreme temperatures or moisture), abnormal soil conditions, or cultural practices, may diminish the effectiveness of the herbicidal action of **Dicamba 52.94% + Rimsulfuron 6.25% WDG**. If rainfall occurs within 4 hours of a post-emergence application of **Dicamba 52.94% + Rimsulfuron 6.25% WDG**, herbicidal activity may be reduced.

APPLICATION INFORMATION

Broadcast Applications

To ensure thorough coverage of the weeds and the best performance, use a minimum of 15 gallons of water per acre (GPA). For light, scattered stands of weeds, use a minimum of 10 GPA. For applications prior to the emergence of crops and target weeds, applicators are required to use a Coarse or coarser droplet size (ASABE S572.1). For all other applications, applicators are required to use a Medium or coarser droplet size (ASABE S572.1).

Apply with the nozzle height recommended by the manufacturer, but no more than 3 feet above the ground or crop canopy unless making a turf, pasture, or rangeland application, in which case applicators may apply with a nozzle height no more than 4 feet above the ground. Ensure that equipment is set up to avoid applying an excessive rate directly over the rows and into the corn plant whorl. Overlaps or starting, stopping, slowing, and turning while spraying may result in crop injury.

Do not apply when wind speeds exceed 10 miles per hour at the application site.

Do not apply during temperature inversions.

Aerial Applications

Use nozzle types and arrangements that will provide optimum spray distribution and coverage in a minimum of 5 GPA. For applications prior to the emergence of crops and target weeds, applicators are required to use a Coarse or coarser droplet size (ASABE S572.1). For all other applications, applicators are required to use a Medium or coarser droplet size (ASABE S572.1).

The boom length must not exceed 65% of the wingspan for airplanes or 75% of the rotor blade diameter for helicopters. Applicators must use ½ swath displacement upwind at the downwind edge of the field. Nozzles must be oriented so the spray is directed toward the back of the aircraft.

Do not release spray at a height greater than 10 feet above the vegetative canopy, unless a greater application height is necessary for pilot safety.

Do not apply when wind speeds exceed 10 miles per hour at the application site.

Do not make application during a temperature inversion, when winds are gusty, or when conditions favor poor coverage and/or off-target spray movement.

Applications made by air are not permitted in the State of New York.

Chemigation

Do not apply **Dicamba 52.94% + Rimsulfuron 6.25% WDG** through any type of irrigation system.

SPRAY DRIFT MANAGEMENT

AVOIDING SPRAY DRIFT AT THE APPLICATION SITE IS THE RESPONSIBILITY OF THE APPLICATOR. The interaction of equipment- and weather-related factors determine the potential for drift. The applicator is responsible for considering these factors when making an application decision.

Information on Droplet Size

The most effective way to reduce spray drift potential is to apply larger droplets. The best drift management strategy is to apply the largest droplets that provide sufficient coverage and control. Applying larger droplets reduces drift potential, but will not prevent drift if applications are made improperly, or under unfavorable environmental conditions.

A droplet size classification system describes the range of droplet sizes produced by spray nozzles. The American Society of Agricultural and Biological Engineers (ASABE) provide a Standard that describes droplet size spectrum categories defined by a number of reference nozzles (fine, coarse, etc.). Droplet spectra resulting from the use of a specific nozzle may also be described in terms of volume mean diameter (VMD). Coarser droplet size spectra have larger VMD's and lower drift potential.

Controlling Droplet Size - General Techniques

- **Application Volume** - Using the highest flow rate nozzles (largest orifice) that are consistent with pest control objectives reduces the potential for spray drift. Nozzles with higher rated flows produce coarser droplet spectra.
- **Pressure** - The lowest spray pressures recommended for the nozzle produce the largest droplets. Higher pressure reduces droplet size and does not improve canopy penetration. When higher flow rates are needed, using a higher-capacity nozzle instead of increasing pressure results in the coarsest droplet spectrum.
- **Nozzle Type** - Select a nozzle type that is designed for the intended application. With most nozzle types, narrower spray angles produce larger droplets. The use of low-drift nozzles will reduce drift potential.
- **Boom Application Height** - Applications made at the lowest boom height consistent with pest control objectives, and that allow the applicator to keep the boom level with the application site and minimize bounce, will reduce the exposure of spray droplets to evaporation and wind, and reduce spray drift potential.

Wind

Drift potential increases at wind speeds of less than 3 mph (due to inversion potential) or more than 10 mph. However, many factors, including droplet size and equipment type determine drift potential at any given wind speed. **AVOID GUSTY OR WINDLESS CONDITIONS.** **Note:** Local terrain can influence wind patterns. Every applicator should be familiar with local wind patterns and how they affect spray drift.

Temperature and Humidity

When making applications in hot and dry conditions, set up equipment to produce larger droplets to reduce effects of evaporation.

Temperature Inversions

Drift potential is high during a temperature inversion. Temperature inversions restrict vertical air mixing, which causes small suspended droplets to remain close to the ground and move laterally in a concentrated cloud. Temperature inversions are characterized by increasing temperature with altitude and are common on nights with limited cloud cover and light to no wind. They begin to form as the sun sets and often continue into the morning. Their presence can be indicated by ground fog; however, if fog is not present, inversions can also be identified by the movement of smoke from a ground source or an aircraft smoke generator. Smoke that layers and moves laterally in a concentrated cloud (under low wind conditions) indicates an inversion, while smoke that moves upward and rapidly dissipates indicates good vertical air mixing. Do not make applications into temperature inversions.

Shielded Sprayers

Shielding the boom or individual nozzles can reduce the effects of wind. However, it is the responsibility of the applicator to verify that the shields are preventing drift and not interfering with uniform deposition of the product.

Air Assisted (Air Blast) - Field Crop Sprayers

Air assisted field crop sprayers carry droplets to the target via a downward directed air stream. Some may reduce the potential for drift, but if a sprayer is unsuitable for the application and/or set up improperly, high drift potential can result. It is the responsibility of the applicator to determine that a sprayer is suitable for the intended application, is configured properly, and that drift is not occurring. **Note:** Air assisted field sprayers can affect product performance by affecting spray coverage and canopy penetration. Consult the application equipment section of this label to determine if use of an air assisted sprayer is recommended.

SPRAY ADJUVANTS

For control of emerged weeds, **Dicamba 52.94% + Rimsulfuron 6.25% WDG** application must include a nonionic surfactant and an ammonium nitrogen fertilizer. If applied in tank mix combination with a glyphosate or glufosinate herbicide that contains a built-in adjuvant system, such as "Roundup Weathermax" or "Liberty", no additional surfactant needs to be added. For burndown applications of **Dicamba 52.94% + Rimsulfuron 6.25% WDG** made before crop emergence, crop oil concentrate may be used in place of nonionic surfactant. Products must contain only EPA-exempt ingredients (40 CFR 1001).

Ammonium Nitrogen Fertilizer

- Apply 2 quarts/acre of a high-quality urea ammonium nitrate (UAN), such as 28%N or 32%N, or 2 pounds/acre of a spray-grade ammonium sulfate (AMS).
- Do not apply with liquid nitrogen fertilizer as the total carrier solution.

Nonionic Surfactant (NIS)

- Apply at 0.25% v/v (1 quart per 100 gallons spray solution).

- Surfactant must have at least 60% nonionic surfactant with a hydrophilic/lipophilic balance (HLB) that is greater than 12.

Petroleum Crop Oil Concentrate (COC) or Modified Seed Oil (MSO)

- Apply at 1% v/v (1 gallon per 100 gallons spray solution) or 2% under dry conditions.
- If there are specific recommends on product labeling, MSO adjuvants may be used at 0.5% v/v (0.5 gallon per 100 gallons spray solution).
- Oil-based adjuvants must have at least 80% high quality, petroleum (mineral) or modified vegetable seed oil with a minimum of 15% surfactant emulsifiers.

Special Adjuvant Types

- Adjuvant combination products may be used at doses that provide the required amount of NIS, COC, MSO and/or ammonium nitrogen fertilizer. Consult the product literature for use rates and restrictions.

Tank Mix Compatibility Testing

Perform a jar test before tank mixing to ensure compatibility of **Dicamba 52.94% + Rimsulfuron 6.25% WDG** and other products. Use a clear quart-sized jar with lid, and mix the ingredients in their relative proportions. Invert the jar containing the mixture several times to mix and observe the mixture for approximately 30 minutes. Do not use if the mixture balls-up, forms flakes, sludge, gel, oily film or layers, or other precipitates because these show that the products are not compatible.

TANK MIX INSTRUCTIONS

1. Fill the tank $\frac{1}{4}$ to $\frac{1}{2}$ with water.
2. While agitating, add the specified amount of **Dicamba 52.94% + Rimsulfuron 6.25% WDG**. Maintain agitation until the product is fully dispersed (for at least 5 minutes).
3. Continue agitation and fill the remainder of the tank with water once the **Dicamba 52.94% + Rimsulfuron 6.25% WDG** is fully dispersed. Thoroughly mix **Dicamba 52.94% + Rimsulfuron 6.25% WDG** with water before adding any other material.
4. While the tank is filling with water, add the required spray adjuvants (crop oil concentrate, nonionic surfactant, or ammonium nitrogen fertilizer).
5. If tank is not continuously agitated, settling will occur. Thoroughly mix before application, if settling occurs.
6. To avoid product degradation, apply **Dicamba 52.94% + Rimsulfuron 6.25% WDG** spray mixture within 48 hours of mixing.

All applicable directions, restrictions, and precautions for the tank mixture herbicide(s) must be followed. The most restrictive label applies to all products in the tank mixture. Tank mixture recommendations are only for use in states where the tank mixture product and application site are registered. Certain states or geographical regions may have established dose rate limitations. Consult your State Pesticide Control Agency for additional information regarding the maximum use rates.

SPRAYER PREPARATION/CLEAN-UP

As soon as possible after applying Dicamba 52.94% + Rimsulfuron 6.25% WDG and before using sprayer equipment for any other applications, thoroughly clean sprayer equipment following the procedure below:

1. Thoroughly drain spray tank, hoses, and spray boom.
2. Rinse the inside of the spray tank with clean water to remove sediment and residues.
3. Flush sprayer hoses, boom and nozzles with clean water.
4. Fill the tank $\frac{1}{2}$ full with clean water, and add tank mix cleaner or ammonia (follow manufacturer's directions for use). Fill the tank to capacity and operate the sprayer for 15 minutes to flush hoses, boom, and nozzles.
5. To ensure thorough cleaning of the spray tank, leave the cleaning solution in the tank, hoses, spray booms and spray nozzles overnight or during storage.
6. Before using the sprayer, drain the spray equipment. Rinse the tank with clean water and flush through the hoses, boom, and nozzles. Clean spray tips and screens separately with the tank mix cleaner or ammonia solution.
7. Dispose of all cleaning solution and rinsate in accordance with Federal, State, and local regulations and guidelines.

Do not drain or flush spray equipment or rinsate on or near desirable trees or plants.

Do not contaminate any body of water including irrigation water that may be used on other crops.

If the sprayer has been stored or left idle, purge the spray boom and nozzles with clean water before starting any application.

If equipment is not cleaned properly, residue of **Dicamba 52.94% + Rimsulfuron 6.25% WDG** can remain in spray equipment, and may be released during subsequent applications potentially causing adverse crop response to certain crops and other vegetation. Rotam accepts no liability for any effects due to equipment that is not cleaned properly. **1 1**

SOIL INSECTICIDE INTERACTION INFORMATION

Dicamba 52.94% + Rimsulfuron 6.25% WDG may interact with certain insecticides previously applied to the crop. Crop response varies with field corn type, insecticide used, insecticide application method, and soil type.

Dicamba 52.94% + Rimsulfuron 6.25% WDG may be applied to corn previously treated with "Fortress", "Aztec", or "Force" insecticides or nonorganophosphate (OP) soil insecticides regardless of soil type.

- Do not apply **Dicamba 52.94% + Rimsulfuron 6.25% WDG** within 60 days of crop emergence where an organophosphate insecticide (such as Counter) was applied as an in-furrow treatment since crop injury may occur. Also, allow at least 60 days between a pre-plant application of **Dicamba 52.94% + Rimsulfuron 6.25% WDG** and application of an organophosphate insecticide since crop injury may result.
- DO NOT APPLY **Dicamba 52.94% + Rimsulfuron 6.25% WDG** to corn previously treated with "Counter" 15G or to corn treated with "Counter" 20CR in furrow or over the row at cultivation.
- Applications of **Dicamba 52.94% + Rimsulfuron 6.25% WDG** to corn previously treated with "Counter" 20 CR, "Lorsban", or "Thimet" may cause unacceptable crop injury, especially on soils of less than 4% organic matter.

PRECAUTIONS

Dicamba 52.94% + Rimsulfuron 6.25% WDG may cause injury to desirable trees and plants, particularly beans, cotton, flowers, fruit trees, grapes, ornamentals, peas, potatoes, soybeans, sunflowers, tobacco, tomatoes, and other broadleaf plants when contacting their roots stems or foliage. These plants are most sensitive to **Dicamba 52.94% + Rimsulfuron 6.25% WDG** during their development or growing stage.

RESTRICTIONS

Injury or loss of desirable trees or vegetation may result from failure to observe the following:

- Do not apply **Dicamba 52.94% + Rimsulfuron 6.25% WDG** or drain or flush application equipment on or near desirable trees or other plants, or on areas where their roots may extend, or in locations where the chemical may be washed or moved into contact with their roots.
- Do not use on lawns, walks, driveways, tennis courts, or similar areas.
- Prevent drift or spray to desirable plants.
- Do not contaminate any body of water.
- Thoroughly clean application equipment immediately after use. (See **SPRAYER PREPARATION/CLEAN-UP** section of this label for instructions).

Crop injury may occur following an application of **Dicamba 52.94% + Rimsulfuron 6.25% WDG** if there is a prolonged period of cold weather and/or in conjunction with wet soils.

A corn plant's predisposition to develop fused tissue merging from the whorl (rattail) after the V-11 stage may increase when a product containing dicamba or other growth regulator herbicides [e.g. **Dicamba 52.94% + Rimsulfuron 6.25% WDG**] is applied to small corn (less than 4 inches in height) under early stressful conditions. See **Environmental Conditions** for a description of these stressful conditions.

Corn may be harvested or grazed for feed once the crop has reached the ensilage (milk) stage or later in maturity. However, do not graze, feed forage, grain or fodder (stover) from treated areas to livestock within 30 days of **Dicamba 52.94% + Rimsulfuron 6.25% WDG** application.

ROTATIONAL CROPS

Follow the rotational intervals listed below when using **Dicamba 52.94% + Rimsulfuron 6.25% WDG**:

Crop Rotational Intervals – 4 Oz. Maximum Use Rate Per Season

Crop	Crop Rotational Interval
Corn (field)	Anytime
Soybeans (Only Sulfonylurea tolerant)	1 Month
Cereals, Winter (wheat)	3 Months
Potatoes, Tomatoes	4 Months
Cereals, Spring (barley, oats, wheat)	9 Months
Alfalfa†, Canola*, Corn (pop & sweet), Cotton*, Cucumber, Flax, Peas, Rice**, Red Clover*, Snap Beans (Dry beans), Sorghum*, Soybeans, Sugarbeets*, Sunflower	10 Months
Crops Not Listed	18 Months

*18 months in the Red River Valley region of ND and MN. In all other areas, the rotation intervals should be extended to 18 months if drought conditions persist after application and before the rotational crop is planted, unless sprinkler irrigation is used and totals greater than 15" during the growing season.

**On soils with pH 6.5 or less.

†On sprinkler irrigated fields in Idaho, Utah, and Northern Nevada it is best to use deep fall tillage such as plowing before planting alfalfa. Product degradation may be less on furrow irrigated soils and may result in some crop injury.

Crop Rotational Intervals – 8 Oz. Maximum Use Rate Per Season

Crop	Crop Rotational Interval
Corn (field)	Anytime
Cereals, Winter (wheat), Potatoes, Soybeans (Only Sulfonylurea tolerant), Tomatoes	4 Month
Cereals, Spring (barley, oats, wheat)	9 Months
Corn (pop & sweet), Cotton*, Cucumber, Flax, Snap Beans (Dry beans), Soybeans, Sunflower	10 Months
Crops Not Listed	18 Months

*The rotation interval should be extended to 18 months if drought conditions persist after application and before the rotational crop is planted, unless sprinkler irrigation is used and totals greater than 15" during the growing season.

CORN - Directions for Use**FALLOW**

Dicamba 52.94% + Rimsulfuron 6.25% WDG may be used as a fallow treatment, in the fall or spring when a majority of weeds have emerged and are actively growing.

Apply **Dicamba 52.94% + Rimsulfuron 6.25% WDG** at 4 ounces per acre. One bottle will treat 20 acres at this application rate.

Tank Mixtures in Fallow

Dicamba 52.94% + Rimsulfuron 6.25% WDG can be used as a fallow treatment and can be used in a tank mixture with other herbicides registered for use in fallow. Read and follow directions for use including the applicable restrictions and limitations on all product labels involved in tank mixing. Follow the most restrictive directions for use and precautionary statements of each product in the tank mixture. Do not use in a tank mixture with **Dicamba 52.94% + Rimsulfuron 6.25% WDG**, if the instructions on the tank mix partner label conflict with this **Dicamba 52.94% + Rimsulfuron 6.25% WDG** label.

FIELD CORN – PRE-PLANT/PRE-EMERGENCE

Dicamba 52.94% + Rimsulfuron 6.25% WDG may be used in conventional, conservation tillage, or no-till crop systems. In field corn production, applications can be made either pre-plant, pre-plant incorporated (less than 2" deep), or pre-emergence. Applications of **Dicamba 52.94% + Rimsulfuron 6.25% WDG** made prior to weed emergence will provide residual control of labeled weeds. The addition of spray adjuvants is required to control emerged weeds. Control can be further enhanced with additional tank mix partners as described in this label.

During a growing season, up to 2 applications of **Dicamba 52.94% + Rimsulfuron 6.25% WDG** may be made. Apply **Dicamba 52.94% + Rimsulfuron 6.25% WDG** at 4 ounce per acre prior to corn emergence. Refer to the cumulative rimsulfuron rate limitations noted in **Product Information**. Sequential applications must be separated by 2 weeks or more.

Pre-Plant Surface Applications: **Dicamba 52.94% + Rimsulfuron 6.25% WDG** can be applied up to 30 days prior to planting. **Dicamba 52.94% + Rimsulfuron 6.25% WDG** is best used in a planned sequential application program, followed by **Dicamba 52.94% + Rimsulfuron 6.25% WDG**, Steadfast Q, tank mixed with appropriate corn herbicide partners post applied. Refer to the respective sequential partner label for specific use directions.

Pre-Plant/Pre-Emerge Burndown Applications: For burndown of labeled weeds 3" or less in height, **Dicamba 52.94% + Rimsulfuron 6.25% WDG** can be applied when weeds are present at the time of treatment in a tank mixture with crop oil concentrate or methylated seed oil. When weeds are greater than 3" in height or weeds not controlled by **Dicamba 52.94% + Rimsulfuron 6.25% WDG** are present, the addition of burndown herbicide (i.e., glyphosate, gramoxone, dicamba, and/or 2, 4-D) is recommended. If giant ragweed, common cocklebur, henbit, Pennsylvania smartweed or purple deadnettle are present at the time of application, the addition of atrazine will improve control. Follow directions for use and precaution and restrictions on the label of the burndown herbicide. When mixing with liquid nitrogen fertilizer or glyphosate, substitute a nonionic surfactant for crop oil.

Restriction:

- Do not apply more than a total of 8 oz. **Dicamba 52.94% + Rimsulfuron 6.25% WDG** (or 0.5 oz. active ingredient rimsulfuron) during the crop year.

FIELD CORN – POST-EMERGENCE

Apply **Dicamba 52.94% + Rimsulfuron 6.25% WDG** to at least 4 inch (V2) corn and less than 20 inches tall. Do not apply to corn that is greater than 20 inches tall or corn that exhibits 7 or more leaf collars, whichever is more restrictive. Applications of **Dicamba 52.94% + Rimsulfuron 6.25% WDG** made after weed emergence will provide contact control of labeled weeds in addition to limited residual control of later emerging weeds.

Make application of **Dicamba 52.94% + Rimsulfuron 6.25% WDG** at 4 ounces per acres as a post-emergence broadcast application.

Timing to Weeds

Tank mixtures of **Dicamba 52.94% + Rimsulfuron 6.25% WDG** with glyphosate or glufosinate herbicides can be applied after weeds emerge, but prior to the maximum size listed on the glyphosate or glufosinate herbicide labels.

For optimum activity, adequate soil moisture is required. Rainfall within 7 days after application will enhance **Dicamba 52.94% + Rimsulfuron 6.25% WDG** residual activity. If activating rainfall or sprinkler irrigation (>0.5 inch) is not received within 7 days after application, follow with a cultivation or with a sequential application of **Primero***, **ACCENT*** or similar herbicide, if needed.

Restrictions:

- Do not apply more than 4 ounces of **Dicamba 52.94% + Rimsulfuron 6.25% WDG** per acre per application.
- Do not apply more than 8 ounces of **Dicamba 52.94% + Rimsulfuron 6.25% WDG** in a single use season.

WEEDS CONTROLLED/SUPPRESSED
POST-EMERGENCE CONTROL

Grasses (1 - 2")	Broadleaves (1 - 3")
Barley, volunteer	Alfalfa, volunteer ¹
Barnyardgrass	Amaranth, Palmer*
Bluegrass, annual	Canada thistle*
Crabgrass, large (1/2")	Chickweed, common
Cupgrass, woolly (1")	Cocklebur*
Foxtail (bristly, giant, green, yellow)	Dandelion (6" diameter)
Johnsongrass, seedling*	Henbit
Millet, Wild Proso*	Jimsonweed*
Panicum, fall	Kochia
Quackgrass*	Ladysthumb*
Ryegrass, Italian*	Lambsquarters, common*
Shattercane (4")	Morningglory, ivyleaf, tall*
Signalgrass, broadleaf*	Mustard, (birdsrape, black, wild)
Stinkgrass*	Nightshade, (hairy, Eastern black*)
Wheat, volunteer	Pigweed, (prostrate, redroot, smooth)
Wild oat*	Purslane, common*
Yellow nutsedge*	Ragweed, (common*, giant*)
	Russian thistle
	Shepherd's purse
	Sicklepod*
	Smartweed, Pennsylvania*
	Waterhemp*
	Wild radish
	Wild sunflower
	Velvetleaf
RESIDUAL CONTROL	
Grasses	Broadleaves
Barnyardgrass	Carpetweed*
Bluegrass, annual*	Chamomile, false
Crabgrass, large*	Cocklebur*
Foxtail (bristly, giant, green, yellow)	Filaree, Redstem
Panicum, fall*	Henbit
Signalgrass, broadleaf*	Jimsonweed*
Wheat, Volunteer	Kochia (ALS-sensitive)
Wild Oat*	Lambsquarters, common
	Morningglory, ivyleaf*
	Mustard (birdsrape, black)
	Nightshade* (hairy, black)
	Palmer amaranth*
	Pigweed (prostrate, redroot, smooth)
	Purslane, common
	Ragweed, common*
	Russian thistle, seedling*
	Smartweed, Pennsylvania*
	Velvetleaf*

*Partial control/suppression.

¹Except in California.

TANK MIXTURES

It is the pesticide user's responsibility to ensure that all products are registered for the intended use. Read and follow the applicable restrictions and limitations and directions for use on all product labels involved in tank mixing. Users must follow the most restrictive directions for use and precautionary statements of each product in the tank mixture. Do not use a tank mix partner product if its label conflicts with this label.

Dicamba 52.94% + Rimsulfuron 6.25% WDG can be tank mixed with other products registered for use in corn at full or reduced rates. Read and follow all manufactures label recommendations for the companion herbicide. If these recommendations conflict with this **Dicamba 52.94% + Rimsulfuron 6.25% WDG** label, do not use as a tank mixture with **Dicamba 52.94% + Rimsulfuron 6.25% WDG**.

Post-Emergence – Dicamba 52.94% + Rimsulfuron 6.25% WDG with Glyphosate

Glyphosate containing products can be tank mixed with post-emergent applications of **Dicamba 52.94% + Rimsulfuron 6.25% WDG** when applications are made to corn hybrids containing the "Roundup Ready" gene.

Consult the **Spray Adjuvants** section for additional information on proper adjuvant selection.

When used in tank mixture with glyphosate, **Dicamba 52.94% + Rimsulfuron 6.25% WDG** will provide improved burndown and/or residual activity on the following weeds:

Alfalfa, volunteer*	Nightshade, hairy
Barley, volunteer	Panicum, fall
Barnyardgrass	Pigweed (prostrate, redroot, smooth)
Bluegrass, annual	Purslane, common
Canada Thistle	Quackgrass
Chamomile, false	Ragweed (common, giant)
Chickweed, common	Ryegrass, Italian
Cocklebur	Sandbur (field, longspine)
Crabgrass	Shepherd's Purse
Dandelion (6" diameter)	Signalgrass, broadleaf
Filaree, redstem	Smartweed, Pennsylvania
Foxtail (bristly, giant, green, yellow)	Stinkgrass
Henbit	Velvetleaf
Johnsongrass, seedling	Waterhemp
Kochia	Wheat, volunteer
Lambsquarters, common	Wild Buckwheat
Millet, Wild Proso	Wild Oat
Morningglory (ivyleaf, tall)	Wild Radish
Mustard (birdsrape, black, wild)	Yellow Nutsedge

*Except in California.

Dicamba 52.94% + Rimsulfuron 6.25% WDG with Glufosinate

Dicamba 52.94% + Rimsulfuron 6.25% WDG can be tank mixed with a glufosinate-containing herbicide, if applications are made to corn hybrids containing the "LibertyLink" gene. Consult your seed supplier to confirm the corn hybrid is "LibertyLink" before making application of any herbicide containing glufosinate.

When used in a tank mixture with glufosinate herbicide, **Dicamba 52.94% + Rimsulfuron 6.25% WDG** will provide improved burndown and/or limited residual activity on the following weeds:

Velvetleaf
Pigweed, redroot
Lambsquarters, common
Foxtail

Tank Mixtures - Additional Control of Broadleaf and Grass Weeds

Dicamba 52.94% + Rimsulfuron 6.25% WDG may be tank mixed with other products registered for use in corn. Consult tank mix partner labeling for rate and soil-type restrictions. Ensure the tank mix product is labeled for the same timing, method of application, adjuvants, and use restrictions as **Dicamba 52.94% + Rimsulfuron 6.25% WDG** and other products used in the tank mixture.

Dicamba 52.94% + Rimsulfuron 6.25% WDG can be tank mixed with "Impact" or similar products with atrazine, for improved burndown or residual control of several broadleaf weeds including common waterhemp, common ragweed, common lambsquarters, and velvetleaf. When making application of mixtures with **Dicamba 52.94% + Rimsulfuron 6.25% WDG** plus Impact, the use of methylated seed oil is recommended. Read the Impact or similar product label for additional information regarding application timing, tank mixtures, adjuvants, rotational crops, and additional use information.

For improved control of kochia, **Dicamba 52.94% + Rimsulfuron 6.25% WDG** may be tank mixed with a fluroxypyr-containing herbicide (such as Starane). Use the higher labeled use rates when weed pressure is heavy. Consult the "Starane" label for application rates, timing, restrictions, and additional use information.

Tank Mixing Restrictions:

- Do not apply **Dicamba 52.94% + Rimsulfuron 6.25% WDG** tank mixtures with glyphosate herbicides to conventional corn hybrids that do not contain the "Roundup Ready" trait.
- Do not apply **Dicamba 52.94% + Rimsulfuron 6.25% WDG** tank mixtures with glufosinate herbicides to conventional corn hybrids that do not contain the "LibertyLink" trait.
- To avoid crop injury or antagonism, apply the products indicated below at least seven days before or 3 days after the application of **Dicamba 52.94% + Rimsulfuron 6.25% WDG**. Do not tank mix **Dicamba 52.94% + Rimsulfuron 6.25% WDG** with "Basagran" and "Laddok" or severe crop injury may occur. Do not tank mix **Dicamba 52.94% + Rimsulfuron 6.25% WDG** with foliar-applied organophosphate insecticides such as "Lorsban", malathion, parathion, etc., as severe crop injury may occur.
- Do not exceed labeled application rates. Do not tank mix **Dicamba 52.94% + Rimsulfuron 6.25% WDG** with other products that contain the same active ingredients as **Dicamba 52.94% + Rimsulfuron 6.25% WDG** (rimsulfuron and dicamba) unless the label of either tank mix partner specifies the maximum rate that may be used.

Dicamba 52.94% + Rimsulfuron 6.25% WDG may be applied in tank mixture with glyphosate plus other products registered for use in field corn (other than the exceptions noted, and in addition to the tank mix partners indicated in the fallow and post-emergence sections above). **Dicamba 52.94% + Rimsulfuron 6.25% WDG** can be applied in tank mix combinations with full or reduced rates of other products provided:

- The tank mix product is labeled for the same timing, method of application, adjuvants, and use restrictions as **Dicamba 52.94% + Rimsulfuron 6.25% WDG** and other products used in the tank mixture.
- The tank mixture is not specifically prohibited on the label of the tank mix product.

Tank Mixing Precautions:

- Weed control and crop response with tank mixtures not specifically recommended in this label or in **Dicamba 52.94% + Rimsulfuron 6.25% WDG** fact sheets or technical bulletins are the responsibility of the user and manufacturer of the tank mix product.
- Prior to mixing, read and follow all use directions, precautions and restrictions on the respective tank mix product labels.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

Pesticide Storage

Store product in original container only. Store in a cool, dry place.

Pesticide Disposal

Waste resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

CONTAINER HANDLING: Refer to the Net Contents section of this product's labeling for the applicable

"Nonrefillable Container" or "Refillable Container" designation.

Nonrefillable Plastic and Metal Containers (Capacity Equal to or Less Than 50 Pounds): Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then, for Plastic Containers, offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration. Do not burn, unless allowed by State and local ordinances. For Metal Containers, offer for recycling if available or reconditioning if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures approved by State and local authorities.

Nonrefillable Plastic and Metal Containers (Capacity Greater Than 50 Pounds): Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then, for Plastic Containers, offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration. Do not burn, unless allowed by State and local ordinances. For Metal Containers, offer for recycling if available or reconditioning if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures approved by State and local authorities.

DO NOT USE CONTAINERS FOR THE STORAGE OF FOOD, FEED, OR DRINKING WATER!

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened and the purchase price will be refunded.

The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather or crop conditions, presence of other materials or other influencing factors in the use of this product, which are beyond the control of ROTAM AGROCHEMICAL COMPANY LIMITED or Seller. To the extent consistent with applicable law, all such risks shall be assumed by Buyer and User, and Buyer and User agree to hold ROTAM AGROCHEMICAL COMPANY LIMITED and Seller harmless for any claims relating to such factors.

ROTAM AGROCHEMICAL COMPANY LIMITED warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. To the extent consistent with applicable law, this warranty does not extend to the use of the product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or ROTAM AGROCHEMICAL COMPANY LIMITED and Buyer and User assume the risk of any such use. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ROTAM AGROCHEMICAL COMPANY LIMITED MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.**

To the extent consistent with applicable law, in no event shall ROTAM AGROCHEMICAL COMPANY LIMITED or Seller be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ROTAM AGROCHEMICAL COMPANY LIMITED AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ROTAM AGROCHEMICAL COMPANY LIMITED OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

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Submitted Electronically

March 10, 2017

Document Processing Desk (REGFEE)
ATTN: Kathryn Montague (PM 23)
Registration Division (7505P)
U.S. Environmental Protection Agency
Office of Pesticide Programs
One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202



Subject: Application to register a new end-use product
"Dicamba 52.94% + Rimsulfuron 6.25% WDG" - (PRIA R310)

Dear Ms. Montague:

Wagner Regulatory Associates, Inc., as agent for Rotam Agrochemical Co., Ltd., (EPA Company No. 83100), is requesting registration of the above referenced product. In support of this request, enclosed are the following documents:

- Letter from Rotam Agrochemical Co., Ltd. appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Registration (8570-1)
- Confidential Statement of Formula – Basic, Alt #1 & Alt #2 (8570-4)
- Formulator's Exemption Statement (8570-27)
- Certification with Respect to Citation of Data (8570-34)
- Data Matrix, EPA internal and public (8570-35)
- Data Transmittal
- Draft Label
- Certification with Respect to Label Integrity
- A copy of the receipt confirming payment of the required registration fees – R310 \$5,301.00
- Data reports as listed in the Transmittal Document

Thank you in advance for your efforts in reviewing this submission. Please do not hesitate to contact me by email at catherine@wagnerreg.com or by phone at 410-920-8756 should you have any questions.

Respectfully submitted,

Catherine M. Parmeter

Catherine M. Parmeter
Agent for Rotam Agrochemical Co., Ltd.

Enclosures

2017-03-10 10:00 AM

DATA TRANSMITTAL DOCUMENT

1. **Name and Address of Submitter**
Rotam Agrochemical Company Ltd.
c/o Wagner Regulatory Associates
PO Box 640, 7217 Lancaster Pike, Suite A
Hockessin, DE 19707
2. **Regulatory Action In Support Of Which This Package Is Submitted**
Application for Registration
Dicamba 52.94% + Rimsulfuron 6.25% WDG
3. **Transmittal Date**
March 10, 2017
4. **List of Submitted Studies**

50204201	Rotam Dicamba 52.94% + Rimsulfuron 6.25% WG; Product Identity and Composition, Description of Materials, Description of Formulation Process, Preliminary Analysis, Discussion of Impurities and Certified Limits, EPA OPPTS: 830.1550, 830.1600, 830.1620, 830.1650, 830.1670, 830.1700, 830.1750.
50204202	Study on The Method Validation of Dicamba Sodium Salt 52.94% + Rimsulfuron 6.25% Water Dispersible Granules, Study No. 1854, EPA OPPTS: 830.1800.
50204203	Study on the Physico-Chemical Properties of Dicamba Sodium Salt 52.94% + Rimsulfuron 6.25% Water Dispersible Granules; Study No. 1855, EPA OPPTS: 830.6302, 830.6303, 830.6304, 830.6313, 830.6314, 830.6315, 830.6316, 830.6317, 830.6319, 830.6320, 830.7000, 830.7300.
50204204	Dicamba sodium salt 52.94%+Rimsulfuron 6.25% WG Product Chemistry – Group B: Request for Waiver for Certain Physical/Chemical Properties Data, EPA OPPTS: 830.6313; 830.6321; 830.7050; 830.7100, 830.7200; 830.7220; 830.7370; 830.7520; 830.7550; 830.7560; 830.7570; 830.7840; 830.7860; 830.7950.
50204205	Acute Oral Toxicity Study (Up and Down Procedure) of Dicamba sodium salt 52.94% + Rimsulfuron 6.25% WG in Wistar Rats, Study No. 16 01 192, EPA OPPTS: 870.1100.
50204206	Acute Dermal Toxicity Study of Dicamba sodium salt 52.94% + Rimsulfuron 6.25% WG in Wistar Rats, Study No. 16 01 193, EPA OPPTS: 870.1200.
50204207	Acute Inhalation Toxicity Study of Dicamba sodium salt 52.94% + Rimsulfuron 6.25% WG in Wistar Rats, Study No. 16 01 194, Study No. 16 01 199, EPA OPPTS: 870.1300.
50204208	Acute Eye Irritation/Corrosion Study of Dicamba sodium salt 52.94% + Rimsulfuron 6.25% WG in Rabbits, Study No. 16 01 199, EPA OPPTS: 870.2400.
50204209	Acute Dermal Irritation/Corrosion Study of Dicamba sodium salt 52.94% + Rimsulfuron 6.25% WG in Rabbits, Study No. 16 01 198; EPA OPPTS: 870.2500.
50204210	Skin Sensitization Study (Maximization Test) of Dicamba sodium salt 52.94% + Rimsulfuron 6.25% WG in Guinea Pigs, Study No. 16 01 195; EPA OPPTS: 870.2600.

Company Official:

Catherine M. Parmeter

Authorized Agent

Catherine M. Parmeter

Signature

Company Name: Rotam Agrochemical Company Ltd.

Company Contact:

Catherine M. Parmeter

Authorized Agent

(410) 920-8756

Phone

<div style="display: inline-block; text-align: center; margin-left: 20px;"> United States Environmental Protection Agency Washington, DC 20460 </div>		✓	Registration	OPP Identifier Number
			Amendment	
			Other	

Application for Pesticide - Section I

1. Company/Product Number 83100-XX	2. EPA Product Manager Kathryn Montague	3. Proposed Classification <input checked="" type="checkbox"/> None Restricted
4. Company/Product (Name) Rotam Agrochemical Co. Ltd. / Dicamba 52.94% + Rimsulfuron 6.25% WDG	PM# 23	
5. Name and Address of Applicant (Include Zip Code) Rotam Agrochemical Company Ltd. c/o Wagner Regulatory Associates, Inc. P.O. Box 640, 7217 Lancaster Pike, Suite A Hockessin, DE 19707 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(1), my product is similar or identical in composition and labeling to: EPA Reg. No. 352-761 Product Name: DuPont Require Q (mp) herbicide

Section - II

<input type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input checked="" type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other - Explain below.
---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

PRIA R310- New End Use Product Registration

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No <i>*Certification must be submitted</i>	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" Unit Packaging wgt. No. per container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" Package wgt No. per container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) HDPE lined bags
-----------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container 1, 2, 5, and 10 pounds	5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product
6. Manner in Which Label is Affixed to Product <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <input type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled </div> <div style="text-align: center;"> <input type="checkbox"/> Other _____ adhesive backed label _____ </div> </div>		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name Catherine M. Parmeter	Title Agent for Rotam Agrochemical Company Ltd.	Telephone No. (Include Area Code) (410) 920-8756 (catherine@wagnerreg.com)
-------------------------------	----------------------------------------------------	-------------------------------------------------------------------------------

Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received <div style="border: 1px solid black; height: 40px; margin: 0 auto; width: 80%;"></div> (Stamped)
2. Signature <i>Catherine M. Parmeter</i>	3. Title Agent for Rotam Agrochemical Company Ltd.	
4. Typed Name Catherine M. Parmeter	5. Date March 10, 2017	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

OFFICE OF PESTICIDE PROGRAMS
REGISTRATION DIVISION (7505P)

28/AUG/2017

MEMORANDUM: Acute Toxicity Data Evaluation Record (DER) for Dicamba 52.94% +
Rimsulfuron 6.25% WDG

Subject: Name of Pesticide Product: Dicamba 52.94% + Rimsulfuron 6.25% WDG
EPA File Symbol: 83100-LA
DP Barcode: D439233
Decision No.: 527179
Action Code: R310
PC Codes: 129009 Rimsulfuron
029806 Dicamba, sodium salt

From: Tracy Keigwin, Biologist *TK*
Chemistry, Inerts and Toxicology Assessment Branch
Registration Division (7505P)

Through: Byron Backus, PhD *Byron T. Backus*
Chemistry, Inerts and Toxicology Assessment Branch
Registration Division (7505P) *Aug-28-2017*

To: Grant Rowland, RM 23
Herbicide Branch
Registration Division (7505P)

Applicant: Rotam Agrochemical Co. Ltd.
c/o Wagner Regulatory Associates, Inc
P.O. Box 640
7217 Lancaster Pike, Suite A
Hockessin, Delaware 19707

FORMULATION FROM LABEL:

<u>Active Ingredient(s):</u>	<u>% by wt.</u>
Sodium salt of dicamba	52.94
Rimsulfuron	6.25
<u>Other Ingredient(s):</u>	<u>40.81</u>

Total: 100.0%

ACTION REQUESTED: The Risk Manager requests a review of acute toxicity studies submitted in support of EPA File Symbol 83100-LA, Dicamba 52.94% + Rimsulfuron 6.25% WDG.

BACKGROUND: Rotam Agrochemical Company, Ltd. has submitted an application for EPA File Symbol 83100-LA, Dicamba 52.94% + Rimsulfuron 6.25% WDG. In support of their application they have submitted the following acute toxicity studies: 50204205 (870.1100), 50204206 (870.1200), 50204207 (870.1300), 50204208 (870.2400), 50204209 (870.2500) and 50204210 (870.2600). The product label states that Dicamba 52.94% + Rimsulfuron 6.25% WDG is a product for post-emergence use in field corn.

DEVIATIONS: The eyes of test subjects in MRID 50204208 were irrigated at 1 hour, which is counter to EPA's Health Effects Test Guidelines. See item #3, below.

COMMENTS AND RECOMMENDATIONS:

1) All 6 studies are acceptable. The acute toxicity profile of EPA File Symbol 83100-LA, Dicamba 52.94% + Rimsulfuron 6.25% WDG:

acute oral toxicity	III	Acceptable	MRID 50204205
acute dermal toxicity	III	Acceptable	MRID 50204206
acute inhalation toxicity	IV	Acceptable	MRID 50204207
primary eye irritation	III	Acceptable	MRID 50204208
Primary skin irritation	IV	Acceptable	MRID 50204209
dermal sensitization	Negative	Acceptable	MRID 50204210

2) The starting dose (2000 mg/kg) was omitted by the study author from the acute oral LD₅₀ calculations to yield an estimated acute oral LD₅₀ of 3129 mg/kg. The death at 2000 mg/kg must be considered when calculating the acute oral LD₅₀. The acute oral LD₅₀ for this product is 2333 mg/kg.

3) The eyes of test subjects were irrigated at 1 hour and again at 24 hours in MRID 50204208. EPA's Health Effects Test Guideline 870.2400 state that the eyes of test subjects should not be rinsed prior to 24 hours. CITAB will still accept this study, contingent that protective eyewear must be worn when handling this product.

4) The registrant has included additional dermal protection for early entry to treated areas (Page 3, Agricultural Use Requirements box). This is appropriate and required, as mandated by the Dicamba RED.

5) The product chemistry team must approve the proposed Basic CSF and Alternate Formulation #1 and Alternate Formulation #2 (all dated March 13, 2017) before this action can be finalized.

The following are the precautionary and first aid statements for this product (next page):

PRODUCT ID #: 83100-LA (83100-56)

PRODUCT NAME: Dicamba 52.94% + Rimsulfuron 6.25% WDG

PRECAUTIONARY STATEMENTS

SIGNAL WORD: CAUTION

Hazards to Humans and Domestic Animals:

Causes moderate eye irritation. Harmful if swallowed. Harmful if absorbed through skin. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Wear protective eyewear, long-sleeved shirt and long pants, socks, shoes, and chemical resistant gloves. Remove and wash contaminated clothing before reuse.

First Aid:

If in eyes:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.
- Call a poison control center or doctor for treatment advice.

If swallowed:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to by a poison control center or doctor.
- Do not give anything to an unconscious person.

If on skin:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

USER SAFETY RECOMMENDATIONS:

User should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.

User should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Reviewer: Tracy Keigwin
DER for: Herbicide Branch

Date: August 28, 2017

The following table is the Acute Toxicity Data Evaluation Record (DER) for the six studies submitted for the proposed product, EPA File Symbol 83100-LA:

1. DP BARCODE: 439233				
2. PC CODE: 129009 Rimsulfuron and 029806 Dicamba, sodium salt				
3. CURRENT DATE: August 28, 2017				
4. TEST MATERIAL: Dicamba 52.94% + Rimsulfuron 6.25% WDG (Batch Number 20160709001; Dicamba acid: 48.3% and Rimsulfuron: 6.27%; pale brown granules)				
Study/Species/Lab Study # /Date	MRID	Results	Tox Cat	Core Grade
Acute oral toxicity / rat Sa-FORD (Maharashtra, India) Study #16_01_192/December 02, 2016 OCSPP 870.1100; OECD 425	50204205	LD ₅₀ Females > 2333 mg/kg bw (note: this differs from the acute oral LD ₅₀ from the study report – see item #2 on page 2) At <u>175 mg/kg</u> the test subject survived. No clinical signs observed. No gross abnormalities observed at necropsy. At <u>550 mg/kg</u> the test subject survived. Following dosing, the test subject exhibited lethargy, ataxia, and abnormal breathing, resolving by study day 1. No gross abnormalities observed at necropsy. At <u>1750 mg/kg</u> (3 rats) all survived. Following dosing, lethargy and ataxia were observed, resolving by study day 1. No gross abnormalities observed at necropsy. At <u>2000 mg/kg</u> the single test subject died within 4 hours of dosing. Prior to death, the test subject exhibited abdominal breathing, in-coordination and lateral recumbancy. At necropsy, the decedent exhibited an empty stomach and emphysema of the lungs. At <u>5000 mg/kg</u> (3 rats) all test subjects were found dead	III	A

		within 1 day of dosing. Prior to death, test subjects exhibited lethargy, ataxia, and abdominal breathing. At necropsy, animal #5 exhibited a red colored frothy exudate from the nostrils. Internally, decedents exhibited moderate to marked red discoloration of the right and/or all lobes of the lungs, froth in the lumen of the trachea up to respiratory bronchioles, and a slight amount of test substance in the stomach and intestine.		
Acute dermal toxicity / rat Sa-FORD (Maharashtra, India) Study #16_01_193/October 29, 2016 OCSPP 870.1200; OECD 402	50204206	LD ₅₀ > 2000 mg/kg bw (both sexes; 5 males and 5 females tested). No mortality. No clinical signs observed. No gross abnormalities observed at necropsy.	III	A
Acute inhalation toxicity / rat Sa-FORD (Maharashtra, India) Study #16_01_194/December 24, 2016 OCSPP 870.1200; OECD 403	50204207	LC ₅₀ > 2.71 mg/L (Nose-only, gravimetric; both sexes and combined). Mean MMAD and GSD: 3.59 μ m \pm 0.05 and 2.86 \pm 0.02, respectively. All rats survived. Test subjects exhibited lethargy at 30 minutes and 1 hour post exposure, resolving by study day 1. No other clinical signs observed. No gross abnormalities observed at necropsy.	IV	A
Primary eye irritation / rabbit Sa-FORD (Maharashtra, India) Study #16_01_199/November 22, 2016 OCSPP 870.2400; OECD 405	50204208	0.1g pulverized test item was instilled into the conjunctival sac. No corneal opacity or iritis observed. All rabbits had 30-40% "corneal damage" on day 1 which was observed using fluorescein strips. Eyes of test subjects were rinsed at 1 hour and 24 hours. All animals (3/3) exhibited positive signs of conjunctivitis (grade 2 or higher redness and/or chemosis) from the 1-hour observation through the 72-hour	III	A

		observation. All scores "0" by the day 7 observation. MMTS can not be determined since the study does not report the degree (if any) of discharge observed.		
Primary dermal irritation / rabbit Sa-FORD (Maharashtra, India) Study #16_01_198/November 14, 2016 OCSPP 870.2500; OECD 404	50204209	PDI = 0.0 (non-irritating). No erythema or edema observed.	IV	A
Dermal sensitization (GPMT)/ Guinea Pig Sa-FORD (Maharashtra, India) Study #16_01_195/November 16, 2016 OCSPP 870.2600; OECD 406	50204210	Not a sensitizer. Tested using Magnusson-Kligman maximization method. 1 control group (5 animals) and 1 test group (10 animals) were used in the main study. Test substance concentration for the induction: 5.0% (w/v; intradermal injection) and 100% (w/v; topical induction). Challenge concentration: 100%. Following challenge, no positive response (grade 1 or higher) was observed at 24 or 48 hours after challenge. No positive responses (grade 1 or higher) were observed in naïve control animals at 24 or 48 hours. The results of the historical positive control study (September 6, 2016-October 22, 2016) with Benzocaine (Ethyl p-Aminobenzoate) were appropriate.	Negative	A

Core Grade Key: A =Acceptable, S = Supplementary, U = Unacceptable, D = Data Gap

**FEE**

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460
OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION
OFFICE OF PESTICIDE PROGRAMS REGISTRATION DIVISION (7505P)

FEE

BARCODE No.: D 439232; **FILE SYMBOL No.:** 83100-LA (EP Review); **PRODUCT NAME:** Dicamba 52.94%+Rimsulfuron 6.25% WDG; **DECISION No.:** 527179; **PC Code(s):** 129009; 029806; **ACTION CODE:** R310; **FOOD Use:** Yes; **COMPANY:** Rotam Agrochemical Co. Ltd.

~~This Document Contains Confidential Information~~

DATE OUT: May 16, 2017

SUBJECT: Dicamba 52.94%+Rimsulfuron 6.25%WDG

FROM: Indira Gairola / Product Chemistry Team
CITAB / RD (7505P)

TO: Grant Rowland / Kathryn Montague RM 07
Herbicide Branch / RD (7505P)

Company Name: Rotam Agrochemical Co. Ltd.

MRID No(s): 502042-01 to -03

INTRODUCTION:

The registrant has submitted product chemistry data for the registration of the new end use product Dicamba 52.94%+Rimsulfuron 6.25%. In support of the registration application, the registrant is submitting 830 series group A & B product chemistry data with MRID No's., 502042-01 to -04 along with a Basic CSF & Alternate CSF #1 & #2 all dated 03/13/17.

CITAB has been asked to determine acceptability of the aforementioned data submitted and the proposed CSF.

SUMMARY OF FINDINGS:

1. Name of Active Ingredients (s) Dicamba (52.94%), Rimsulfuron (6.25).
2. Has the registrant claimed substantial similarity to a registered product?
[x] Yes; [] No; [] NA; if yes give the registration number of the cited product.
3. All of the source materials of the active ingredient are derived from registered sources
[x] Yes [] No
4. All inert ingredients have been screened by CITAB (Inert Team) and found to be approved for the proposed label uses - [x] Yes; [] No

BARCODE No.: D 439232; **FILE SYMBOL No.:** 83100-LA (EP Review); **PRODUCT NAME:** Dicamba 52.94%+Rimsulfuron 6.25% WDG; **DECISION No.:** 527179 **PC Code(s):** 129009; 029806; **ACTION CODE:** R310; **FOOD Use:** No; **COMPANY:** Rotam Agrochemical Co. Ltd.

Confidential Statement of Formula(s):

☒ Basic – Dated 03/13/17

☐ Re-submitted – Dated

☒ Alternate Alternate CSF #1 & #2 both dated 03/13/17

Alternate CSF(s) complies with 40CFR§152.43: ☒ Yes; ☐ No; ☐ NA

6. Product label

a. Ingredient statement: Nominal concentration of AI listed on CSF(s) concurs with product label (PR Notice 91-2)

☒ Yes- if not, explain below:

Is the sub statement in compliance with PR Notice 97-6 (inert ingredient vs other ingredient)

☒ Yes; ☐ No; if not, explain below

Metallic equivalent: ☐ Yes ☒ NA;

Soluble arsenic: ☐ Yes ☒ NA

Isomeric ratios: ☐ Yes ☒ NA

Acid Equivalent: ☐ Yes ☒ NA

b. Health related sub statements: Product contains?

Petroleum distillate at > 10%: ☐ Yes; ☐ No; ☒ NA

Methanol at > 4%: ☐ Yes; ☐ No; ☒ NA

Sodium nitrate/sodium nitrite ☐ Yes; ☐ No; ☒ NA

c. Physical chemical hazard statement: Product label requires a statement per 40 CFR §156.78 for: flammability, explosive potential or electric insulator breakdown?

☐ Yes ☒ No

Is the sub statement in compliance with PR Notice 98-6 (Total Release Fogger)?

☐ Yes; ☐ No; ☒ NA; if not, explain below

d. Label requires an additional Storage and Disposal statement ☐ Yes ☒ No; if yes explain below:

BARCODE No.: D 439232; **FILE SYMBOL No:** 83100-LA (EP Review); **PRODUCT NAME:** Dicamba 52.94%+Rimsulfuron 6.25% WDG; **DECISION No.:** 527179_PC **Code(s):** 129009; 029806; **ACTION CODE:** R310; **FOOD Use:** No; **COMPANY:** Rotam Agrochemical Co. Ltd.

7. Group A: Product Chemistry Data

CITAB's determination of the acceptability for the proposed product is listed in the tables below.

Guideline No.	Study Title		Data submitted		CITAB's Assessment of Data	MRID Nos. Cited
			Yes	No		
830.1550	Product Identity & Composition		x		A	502042-01
830.1600	Description of materials used to produce the product		x		A	502042-01
830.1650	Description of formulation process		x		A	502042-01
830.1670	Discussion on the formation of impurities		x		A	502042-01
830.1700	Preliminary analysis				NA	
830.1750	Certified limits (158.350)	Standard certified limits				Applicant has provided justification for certified limits
		Proposed Limits	x			
		Justification for wider limits				
830.1800	Enforcement analytical method ¹		x		A	502042-02 Validated method was provided includes linearity curve, specificity precision & accuracy

A = Acceptance, N = Not Acceptable, G = Data Gap, W = Waiver Request, I = In Progress, NA = Not Applicable; U = Upgradeable.

BARCODE No.: D 439232; **FILE SYMBOL No:** 83100-LA (EP Review); **PRODUCT NAME:** Dicamba 52.94%+Rimsulfuron 6.25% WDG; **DECISION No.:**527179 **PC Code(s):** 129009; 029806; **ACTION CODE:** R310; **FOOD Use:** No; **COMPANY:** Rotam Agrochemical Co. Ltd.

Group B:

Guideline No.	Study Title	Value or Qualitative Description	CITAB's Assessment of Data	MRID Nos.
830.6303	Physical State	Granules at 25.1°C	A	502042-03
830.6314	Oxidation/ Reduction	Compatible with all reagents	A	502042-03
830.6315	Flammability	Test substance was not flammable when it was ignited with hot flame (5mins.)	A	502042-03
830.6316	Explodability	Non explodable	NA	502042-03
830.7000	pH	(1% solution) 6.81 at 25°C	A	502042-03
830.7100	Viscosity	Solid	NA	
830.7300	Density (units)	Pour density 0.66 g/mL at 25°C, Tap density 0.74 g/mL at 25°C	A	502042-03
830.6317	Storage stability Or Accelerated storage stability	Accelerated storage stability showed the test substance is stable on storage without any significant change in its active ingredients	A	502042-03
830.6320	Corrosion characteristics or Accelerated corrosion characteristics	The test substance is stable on storage without any significant change in physico-chemical properties	A	502042-03

A = Acceptance, N = Not Acceptable, G = Data Gap, W = Waiver request, NA = Not applicable, I = In progress; U = Upgradeable.

BARCODE No.: D 439232; **FILE SYMBOL No:** 83100-LA (EP Review); **PRODUCT NAME:** Dicamba 52.94%+Rimsulfuron 6.25% WDG; **DECISION No.:**527179_PC **Code(s):** 129009; 029806; **ACTION CODE:** R310; **FOOD Use:** No; **COMPANY:** Rotam Agrochemical Co. Ltd.

CONCLUSIONS:

CITAB has reviewed the product chemistry data submitted for the end-use product Dicamba 52.94%+Rimsulfuron 6.25%WDG and has concluded that:

A. Substantial similarity to the cited product (Reg. No)

- ☐ Similar
- ☐ Not similar, give reasons: .
- ☐ Identical
- ☐ Not identical
- ☒ Not applicable

B 1. Basic CSF (dated 03/13/17)

- ☒ Acceptable
 - ☐ Not Acceptable
 - ☐ Not Applicable
- provide the reasons

2. Alternate CSF #1 & #2 (dated 03/13/17)

- ☒ Acceptable
- ☐ Not Acceptable If not acceptable give reasons
- ☐ Not Applicable

C Group A Product Chemistry Data

- ☒ Acceptable
- ☐ Acceptable with the exception of Guideline (s)
- ☐ Not acceptable
- ☐ Not required
- ☐ Data cited

D Group B Product chemistry data

- ☒ Acceptable
- ☐ Not acceptable
- ☐ Acceptable with the exception of Guideline (s)
- ☐ Not required
- ☐ Data cited-not acceptable

E. Product Label / Draft Label

Recommendations – ☒ No



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

March 15, 2017

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

OPP Decision Number: D-527179
EPA File Symbol or Registration Number: 83100-LA
Product Name: Dicamba 52.94% + Rimsulfuron 6.25% WDG
EPA Receipt Date: 10-Mar-2017
EPA Company Number: 83100
Company Name: ROTAM AGROCHEMICAL COMPANY, LTD.

MS. CATHERINE M. PAMETER
ROTAM AGROCHEMICAL COMPANY, LTD.
c/o Wagner Regulatory Associates Inc
PO Box 640
7217 LANCASTER PIKE, SUITE A
HOCKESSIN, DE 19707-

SUBJECT: Receipt of Registration Application Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application and certification of payment. If you submitted data with this application, the results of the PRN-2011-3 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R310
NEW END-USE OR MANUFACTURING USE PRODUCT WITH REGISTERED
SOURCE(S) OF ACTIVE INGREDIENT(S);INCLUDES PRODUCTS CONTAINING TWO
OR MORE REGISTERED ACTIVE INGREDIENTS PREVIOUSLY COMBINED IN OTHER
REGISTERED PRODUCTS;REQUIRES REVIEW OF DATA PACKAGE WITHIN RD
ONLY;INCLUDES DATA AND/OR WAIVERS OF DATA FOR ONLY;;PRODUCT
CHEMISTRY;ACUTE TOXICITY;PUBLIC HEALTH PEST EFFICACY;CHILD
RESISTANT PACKAGING;

No additional payment is due at this time.

If you have any questions, please contact the Pesticide Registration Service Fee
Ombudsman at (703) 347-0510.

Sincerely,

A handwritten signature in black ink, appearing to be "Frent End Processing Staff".

Frent End Processing Staff
Information Technology & Resources Management Division



Receipt

Your payment is complete

Pay.gov Tracking ID: 26169GRI

Agency Tracking ID: 75202118069

Form Name: Pesticide Registration Improvement Act - Prepayment

Application Name: PRIA Service Fees

Payment Information

Payment Type: Debit or credit card

Payment Amount: \$5,301.00

Transaction Date: 03/10/2017 02:34:19 PM EST

Payment Date: 03/10/2017

Registration Number:

Company Name: Rotam Agrochemical Co Ltd

Company Number: 83100

Action Code: R310

Account Information

Cardholder Name: Cheryl R Wagner

Card Type: American Express

Card Number: *****2008

Email Confirmation Receipt

Confirmation Receipts have been emailed to:

jmw@wagnerreg.com

DOCUMENTUM

